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April 5, 1994

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HAND DELIVER

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Hearing Branch, Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W., Suite 7212
Washington, D.C. 20554

HAND DELIVER

RE: Submission of Affidavits of Non-Public Witnesses

Gentlemen:

In accordance with the Presiding Officer's Order (FCC 94M-39, released January 26, 1994, and his instructions during the prehearing conference of August 13, 1993 (Tr. 8-9), Trinity Christian Center of Santa Ana, Inc. herewith provides the sworn declarations or affidavits of 30 "non-public" witnesses upon which it intends to rely as part of its comparative case.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

MAY & DUNNE, CHARTERED

By: 

Joseph E. Dunne III
Attorney for Trinity Christian
Center of Santa Ana, Inc.

CMM:gmcB78
enclosures

xc: The Honorable Joseph Chachkin, Administrative Law Judge
(Hand Deliver, FCC Room 226)

TABLE OF CONTENTS

INDEX TO DECLARATIONS

Theodore Baehr	1.
Marie Bell	2.
Finee Bishop	3.
Karala L. Boynton	4.
Ruth M. Bray	5.
Philip Bray	6.
Robert G. Brown	7.
Jeanette L. Brown	8.
Brian Burns	9.
Judith A. Burns	10.
Bernece Clure	11.
LaVerne Crawford	12.
Rev. Ronald A. Crews	13.
Robert L. Crutchfield	14.
Jerry A. Dasch	15.
Creflow A. Dollar, Jr.	16.
K. Debra Douglas	17.
Shelia M. Hollimon	18.
Joseph H. Hunter	19.
Bishop Flynn A. Johnson	20.
Cora L. Lester	21.
Louis S. Martin	22.
Larry J. Massey	23.
Regina E. Murphy	24.
Bishop Earl P. Paulk, Jr.	25.
Marie Ring, R.N.	26.
Gary L. Smith	27.
Mrs. Candi Staton-Sussewell	28.
Dr. Marty Tingelhoff	29.
Eric N. Westlake	30.

Federal Communications Commission

Docket No. 93-156 Exhibit No. 1

Presented by Trinity MAY 17 1994 Identified MAY 17 1994

Disposition Received Rejected MAY 17 1994

Reporter Anna

Date MAY 17 1994

DECLARATION OF THEODORE BAEHR

1. My name is Theodore Baehr. I am the Chief Executive Officer of the Christian Film and Television Commission, headquartered in Atlanta. I reside at 2876 Mabry Road, N.E., Atlanta, Georgia 30319.

2. I have been a resident of Atlanta since 1980, and I am submitting this Declaration to the Federal Communications Commission to give my testimony concerning the benefits to the Atlanta community provided by WHSG-TV's program service during the license term which began February 23, 1991 through the end of February, 1992 (hereinafter referred to as the "License Term").

3. The Christian Film and Television Commission is a nonprofit organization whose goals are to improve the quality of media by meeting with media executives to encourage the production of quality programming and to give awards to quality programming which is produced. Our other goal is to do movie reviews to inform parents concerning the values and other aspects of popular movies not normally included as part of movie reviews and to develop parent's discernment concerning the impact of media, both movies and television, in their lives. We publish a magazine called "Movieguide," which provides a family guide to popular movie entertainment.

4. I have had a long education in liberal arts disciplines and have a broad range of experience in various aspects of the TV

and film production which give me a wide expertise on media issues. After studying overseas at Cambridge, Bordeaux and Toulouse, and Munich, I was awarded a B.A. degree in comparative literature with High Distinction (summa cum laude), from Dartmouth College in 1969. I was subsequently awarded a Juris Doctor degree from the New York University School of Law. I was the Director of the Television Center at the City University of New York. After a conversion experience I attended the seminary at the Institute of Theology at the Cathedral of St. John the Divine in New York. I was the president of the Episcopal Radio and Television Commission ("ERTC"). During my tenure as president the Episcopal Radio and Television Commission produced the Emmy award winning children's program, The Narnia Chronicles: The Lion , the Witch, and the Wardrobe. I was nominated for several Emmy awards for programming broadcast on the Public Broadcasting System and on CBS. I am a member of the board of directors of over 20 media-oriented organizations including the National Religious Broadcasters Association, the American Theater of Actors, and the Theological Summit Conference, and I am an active member of organizations such as The National Press Club. I am the author of "Getting the Word Out," "Christian Family Guide to Movies and Videos (Vol. I & II)," and "Television and Reality," among others, and produce a weekly column that is syndicated in 44 newspapers nationwide.

5. During the License Term I appeared on WHSG-TV doing a four minute movie review during the Real Videos program, hosted by

Matt Crouch. The Real Videos program was broadcast on Sunday morning at 1:00 p.m. during the License Term. I also watched several programs on WHSG-TV, particularly those oriented toward children. I did not watch every children's program broadcast during the License Term. The programs that I saw on WHSG-TV directed toward children (including teenagers) included: Real Videos, broadcast on Sunday morning at 1:00 a.m. during the License Term; The Josh McDowell Show, broadcast most of License Term on Saturday afternoon at 2:00 p.m.; and, John Jacobs and The Power Team, broadcast throughout the License Term at 12:00 a.m. on Saturday nights or at 1:00 p.m. on Saturday afternoons. Real Videos was a music video show which also included travel to various locations, such as a mountain or amusement park. The show was directed toward teenagers, and included lessons on the geography, both physical and cultural, of the location visited. The Josh McDowell Show was a show directed at teenagers, and featured the host talking about teen-age issues and teen-age questions. The issues that were discussed on the programs that I saw included the issues of teen-age sexuality and drug abuse, teen-age violence, and encouraged teenagers to respect one another and solve their problems non-violently. The John Jacobs and the Power Team show involved John Jacobs and his power team performing feats of strength interspersed with commentaries about teen issues such as peer pressure. Again, the show was specifically directed toward older pre-teens and teenagers.

6. With respect to each of these programs if found the programming to be wholesome, age specific, and containing instructional and education content as well as directly addressing teen-specific problems. The programming included no violence directed toward another person, was uplifting and promoted positive role models for the children, and included no negative elements which would might lead children to adopt negative behavior models.

SUPPORTING DECLARATION

I, Theodore Baehr, hereby declare under penalty of perjury of the laws of the United States and the State of Georgia, that the foregoing "Declaration of Theodore Baehr," consisting of three (3) pages, is true and correct to the best of my knowledge and belief.

Executed this 4 day of April, 1994.


Theodore Baehr

VERIFIED STATEMENT OF SUPPORT FOR THE
RENEWAL GRANT OF WHSG-TV, MONROE, GEORGIA

My name is Marie Bell. I live at 2221 Old Covington Hwy
(state your name) (give your address)

Congers Ga 30207. I have been
which must be within the channel 63 service area).

watching WHSG-TV, channel 63 on a regular basis, at least 4 hours
per day, since it came on the air February 22, 1991, and continuing
through March 1, 1992. Indeed, I have continuously watched channel
63, although I am here confining my comments to the February 22, 1991 -
February 27, 1992 time frame. Watching channel 63 has been a positive
experience that has helped me deal with my problems.

(Describe in your own words, how watching channel 63 has affected
your life.) The Childrens programs give my
Children an alternative to the secular
trash thats aired every Saturday. The
Daily & Nightly programs give me hope
and other solutions to the problems I face
every day. I really enjoy Kenneth Copeland
and Benny Hinn they uplift. We need
more stations like TBN who promote
good and wholesome viewing for our families.
The other station promote sex, violence,
Cursing ect ect. Our World needs solutions
and a piece of hope and TBN offers it
It is my prayer that TBN will
continue with no interaption Thanks
TBN I love you!

What I have described is true. I give this testimony under penalty
of perjury of laws of the state of Georgia, and I understand that this
completed form will be submitted to the Federal Communications Commis-
sion in connection with WHSG-TV's renewal application.

Marie Bell
Signature

Name: Marie Bell

Address: 2221 Old Covington Hwy
Congers, Ga 30207

Telephone No. 483-7542

Date: 4-2-94

Federal Communications Commission

Docket No. 93-186 Exhibit No. 2

Presented by Trinity

Disposition	{	Identified	<u>MAY 17 1994</u>
		Received	<u> </u>
		Rejected	<u>MAY 17 1994</u>

Reporter Am W

Date MAY 17 1994

VERIFIED STATEMENT OF SUPPORT FOR THE
RENEWAL GRANT OF WHSG-TV, MONROE, GEORGIA

My name is Finee Bishop.
(state your name)

I live at 3614 Orchard Circle
(give your address,



Decatur, Ga. 30032. I have been
which must be within the channel 63 service area).

watching WHSG-TV, channel 63 on a regular basis, at least 1 hours
per day, since it came on the air February 22, 1991, and continuing
through March 1, 1992. Indeed, I have continuously watched channel
63, although I am here confining my comments to the February 22, 1991 -
February 27, 1992 time frame. Watching channel 63 has been a positive
experience that has helped me deal with my problems.

(Describe in your own words, how watching channel 63 has affected
your life.)

It helps me to cope with the
everyday problems of being a single
parent.

What I have described is true. I give this testimony under penalty
of perjury of laws of the state of Georgia, and I understand that this
completed form will be submitted to the Federal Communications Commis-
sion in connection with WHSG-TV's renewal application.

Finee Bishop
Signature

Name: Finee Bishop

Address: 3614 ORCHARD Circle
Decatur, GA. 30032

Telephone No. 284-9022

Date: 4-3-94

Federal Communications Commission	
Docket No. <u>93-154</u>	Exhibit No. <u>3</u>
Presented by <u>Trinity</u>	<u>MAY 17 1994</u>
Disposition	Identified _____
	Received _____
	Registered <u>MAY 17 1994</u>
Reporter <u>Aluw</u>	
Date <u>MAY 17 1994</u>	

A

VERIFIED STATEMENT OF SUPPORT FOR THE
RENEWAL GRANT OF WHSG-TV, MONROE, GEORGIA

My name is Karala L. Boynton I live at 2167 Newgate Dr.
(state your name) (give your address,

Decatur Ga 30035. I have been
which must be within the channel 63 service area).

watching WHSG-TV, channel 63 on a regular basis, at least 2-3 hours
per day, since it came on the air February 22, 1991, and continuing
through March 1, 1992. Indeed, I have continuously watched channel
63, although I am here confining my comments to the February 22, 1991 -
February 27, 1992 time frame. Watching channel 63 has been a positive
experience that has helped me deal with my problems.

(Describe in your own words, how watching channel 63 has affected
your life.) Channel 63 has affected my
life by bringing the inspired
word of God to me and my family,
a lot of times it seems as if right
when we need a word from the Lord.
It also minister to us in music
by which is also the word of God.
The Cartoons on Saturday are
good bible learning times for
our 8 year old son and the
youth Praise and worship inspires
our 17 year old son on
Saturday night. In other words that
Channel ministers to the whole
family.

What I have described is true. I give this testimony under penalty
of perjury of laws of the state of Georgia, and I understand that this
completed form will be submitted to the Federal Communications Comis-
sion in connection with WHSG-TV's renewal application.

Karala L. Boynton
Signature

Name: Karala L. Boynton

Address: 2167 Newgate Dr
Decatur, Ga 30035

Telephone No. 404-284-5330

Date: 4-2-94

Federal Bureau of Investigation	
Case No. <u>93-154</u>	<u>4</u>
Prisoner's Name <u>Trinity</u>	
Disposition <u>Released</u>	<u>MAY 17 1994</u>
Reporter <u>Amw</u>	<u>MAY 17 1994</u>
Date <u>MAY 17 1994</u>	

DECLARATION OF RUTH MAYO BRAY

1. My name is Ruth Mayo Bray. I am now an evangelist with my husband with Look-Up Ministries, an evangelistic ministry that carries the gospel to foreign lands, and I reside at 6011 East Gate Court, Stone Mountain, Georgia 30087.

2. I have lived in the Atlanta area for approximately forty years, and I am submitting this Declaration to provide the Federal Communications Commission with testimony concerning the contributions made by WHSG-TV to the community during its last license term, roughly from February 23, 1991 through the end of February, 1992 (hereinafter referred to as the "License Term."

3. Until July, 1991, my husband was the pastor of the Tabernacle Church at 1580 Agape Way, Decatur, Georgia. Our church sold Trinity Broadcasting Network ("TBN") the land on which their offices and now their studio is located for WHSG-TV. The Tabernacle is an old, established church, and has a large congregation. The Tabernacle seats from 2,000 to 3,000 people for services.

4. My husband and I found that WHSG-TV programming provided some real benefits to the members of our community and our congregation. One of the Tabernacle outreach ministries with which I was involved was "the Senior Saints," a church organization for the elderly who were ill and often housebound. At the time (February through July, 1991) we had over 100 people in the "Saints" to which we regularly ministered by visiting and attending to their needs. Among the "Saints" was a man who had been the

Federal Communications Commission

Declar. No. 93-152 Exhibit No. 5

Prepared by Tele. Ind.

Identified Aug 17-94

Disposition

Accepted

Rejected

May 17 1994

Report

4/17/94

AW

Date

pastor of Tabernacle for 30 years before he retired, but who had suffered a stroke which had left him largely bedridden. He told me many times how much he appreciated WHSG-TV programming, because it was the only "church" that he could attend. Moreover, since he was bedridden he particularly appreciated the positive, cheery programming on WHSG-TV which featured many different personalities. Most of the "Saints" that we ministered to were housebound and watched WHSG-TV on a regular basis. Many of the "Saints" told us that they thought of the station as "family," and that the conversation and personalities on the station helped them with their loneliness. One lady described WHSG-TV as "an inspiration in the lonely hours." Others of the "Saints" told us that they found the cheerful positive programming, some of which described how others had triumphed over illness and loneliness, very inspirational and helpful with their healing. Another particular that proved such a blessing to not only our "Senior Saints" but to hundreds of our members was the "Praise The Lord" program with Paul and Jan and their other hosts. The variety of people, singers, businessmen, housewives, etc. who minister was great. We were blessed by the people of national reputation and were happy to have Christian TV in Atlanta.

5. The "Saints" were obviously concerned about their health, and health issues, and found Calling Dr. Whittaker and The Doctor and the Word particularly helpful since both programs contained information about nutrition, often emphasizing nutrition for the elderly, as well as other health issues which were important to the

"Saints." John Hagee's show also particularly ministered to the elderly.

6. The elderly were not the only people who benefitted from WHSG-TV programming, however. Our church also ministered to young adults, and between the time that the station came on the air and the time we left our ministry at the Tabernacle no less than a half dozen young adults came to our church for ministry who told us that they had had alcohol or drug addiction problems and were flipping through the channels on their TV set and saw a program on WHSG-TV that encouraged them to seek help for their problem. These programs on WHSG-TV, according to the testimony of these young people, had a dramatic impact on their lives. They sought us out to help finish the process that WHSG-TV programming had begun.

7. My husband and I appeared on a Praise the Lord show in the Fall of 1991 with Jan and Paul Crouch. The show was produced in Dallas, and my husband and I were interviewed about our ministry and about the progress of the station in Atlanta, since the station's studios were located right behind the church we had pastored. We received a great deal of response from appearing on the Praise the Lord program. Many people came to our ministry as a result of the publicity we received on TBN, and we are constantly running into people in our ministry who told us that they had seen us on TBN.

8. During the License Term I was a regular watcher of WHSG-TV programming. In addition to the programs which I thought were particularly valuable to "the Saints," such as Calling Dr.

Whittaker and The Doctor and the Word, I thought that the Praise the Lord show was particularly responsive to the problems and needs of our congregation and the community. I can't now remember any specific programs, but I do remember seeing several programs about people who had had problems with drug and alcohol abuse who described the way that they beat the problem and who tried to give hope to the viewers who had the same problem that there were means and methods and people out there in their communities who could help them deal with the problem.

SUPPORTING DECLARATION

I, Ruth Mayo Bray, hereby declare under penalty of perjury of the laws of the United States and the State of Georgia that the foregoing "Declaration of Ruth Mayo Bray," consisting of four (4) pages, is true and correct to the best of my knowledge and belief.

Executed this 30th day of March, 1994.

Ruth Mayo Bray
Ruth Mayo Bray